

To: Higginbotham, Paul[PHIGGINB@idem.IN.gov]
From: Hess, Catherine
Sent: Mon 8/8/2016 5:24:21 PM
Subject: FW: Comments on the draft NOI form of NCCW general permit

Here's the email with their comments on the NOI form for Once-through Noncontact cooling water.

From: Soong, David [mailto:soong.david@epa.gov]
Sent: Saturday, October 04, 2014 10:51 AM
To: Hess, Catherine
Cc: Ireland, Scott; Kuefler, Patrick; Ramach, Sean; Bell, Brian
Subject: Comments on the draft NOI form of NCCW general permit

Catherine,

We have reviewed the draft NOI form of NCCW general permit (ING250000), and have the following comments for your consideration. Please contact us if you would like to discuss, thanks.

A. Page 3 of 8, Part F, add item C as follow, or similar language "You may attach additional sheets if there are more than one NCCW Outfall." Since Part F Table only provides room for one Outfall's effluent characteristics information, but the permittee may apply more than one NCCW Outfall (see Part E requests all NCCW Outfalls information).

B. Page 3 of 8, Part D; the third sentence states that "You will also need to completed Part **IV** of this application to determine if "

1) Part D states that the applicant needs to provide information for the cooling water intake structure if the withdrawal is from a surface water in Part IV. There is no Part IV in the permit submitted to us for review. IDEM should require basic information on the cooling water intake structure, the source water and any available information as to the impingement and entrainment impacts. It is recommended that IDEM require the applicant to submit a letter from the local USFWS field office that identifies any threatened or endangered species or critical habitat in the vicinity of

the intake. The applicant should also be required to specifically check off that they meet each of the eligibility requirements related to 316(b).

2) The eligibility requirement to have no impingement or entrainment of fish would most likely prevent any withdrawal from a surface water under this permit. Under the 316(b) rules, "fish" is described to include all life stages from egg to adults and it is highly unlikely that any facility can avoid drawing in eggs. You may wish to consider whether this was the intent of the permit.

3) The map should include a requirement to show where the intake is located if a surface water intake is utilized.